



4147 '99 15V15 P3:19

October 25, 1999



The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) Maintains cellular health.
- (2) The antigenic properties promote healthy cellular division, function, and growth.
- (3) The bovine thymus PMGTM extract in Thymus PMG appears to neutralize the circulating antibody, thereby contributing to the maintenance of cellular health.
- (4) Thymus PMG improves calcium absorption.
- (5) Thymus PMG enhances metabolic efficiency.
- (6) Magnesium functions as a co-factor, assisting enzymes in catalyzing many chemical reactions.
- (7) Magnesium functions in such reactions as nerve conduction and nerve excitability; transfer of energy, muscular activity; and many other specific processes.
- (8) Magnesium and calcium play an important role in human metabolism.
- (9) Thymus PMG helps support the development and diversity of lymphocytes for reacting against different specific antigens and to not react against proteins and other antigens that are present in the body's own tissues.
- (10) Thymus PMG provides nutritional ingredients and support for the thyroid tissues.

LET 4570

97S-0162

67914





These statements are made for a dietary supplement containing a proprietary blend of bovine thymus PMG™ extract, and magnesium citrate. Other ingredients include calcium lactate, cellulose, and calcium stearate. The name of the product is Thymus PMG®.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden
Standard Process Inc.

